

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC,

Debtor

Bankruptcy

Case No. 22-60043 (CML)

Chapter 11

(Subchapter V)

In re:

ALEXANDER E. JONES,

Debtor

Bankruptcy

Case No. 22-33553 (CML)

Chapter 11

David Wheeler, Francine Wheeler,  
Jacqueline Barden, Mark Barden, Nicole  
Hockley, Ian Hockley, Jennifer Hensel,  
Donna Soto, Carlee Soto Parisi, Carlos M.  
Soto, Jillian Soto Marino, William  
Aldenberg, William Sherlach, Robert  
Parker, and Richard M. Coan, as chapter 7  
trustee for the Estate of Erica Lafferty,

Plaintiffs

v.

Alexander E. Jones and  
Free Speech Systems LLC,

Defendants

Adv. Pro. No. 23-03036 (CML)

Adv. Pro. No. 23-03037 (CML)

**MOTION TO WITHDRAW AS COUNSEL  
FOR CONNECTICUT PLAINTIFFS**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

TO THE HONORABLE CHRISTOPHER LOPEZ, U.S. BANKRUPTCY JUDGE:

Daniel Sinnreich (Movant) files this Motion to Withdraw as Counsel for Connecticut Plaintiffs and respectfully asks the Court to allow him to withdraw as attorney of record for Mark Barden, Jacqueline Barden, Francine Wheeler, David Wheeler, Ian Hockley, Nicole Hockley, Jennifer Hensel, William Aldenberg, William Sherlach, Carlos M. Soto, Donna Soto, Jillian Soto-Marino, Carlee Soto Parisi, and Robert Parker (collectively, the Connecticut Plaintiffs) in the above-referenced cases.

An attorney may withdraw from representation upon leave of the court and a showing of good cause and reasonable notice to the client. The law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, and its attorneys of record, other than Daniel Sinnreich, continue to represent the Connecticut Plaintiffs. Thus, withdrawal of counsel will not unduly delay or disrupt this case, nor will withdrawal cause prejudice to the Connecticut Plaintiffs.

For these reasons, Movant respectfully asks the Court to grant this Motion to Withdraw as Counsel for the Connecticut Plaintiffs for all purposes and grant Movant

such other and further relief as reasonably necessary to effect the withdrawal.

Respectfully submitted this 3rd day of October 2023.

/s/ Ryan E. Chapple

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-and-

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**ATTORNEYS FOR  
CONNECTICUT PLAINTIFFS**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Withdraw as Counsel was served via the Court's CM/ECF on all parties entitled to such notice on this 3rd day of October 2023.

/s/ Ryan E. Chapple

Ryan E. Chapple